

W. PAUL SCHUCK (Cal. Bar No. 203717)
pschuck@bztm.com
BARTKO, ZANKEL, TARRANT & MILLER
A Professional Corporation
900 Front Street, Suite 300
San Francisco, California 94111
Telephone: (415) 956-1900
Facsimile: (415) 956-1152

ANDREW G. DiNOVO (*Pro Hac Vice*)
adinovo@dpelaw.com
ADAM G. PRICE (*Pro Hac Vice*)
aprice@dpelaw.com
DiNOVO PRICE ELLWANGER & HARDY LLP
7000 N. MoPac Expressway, Suite 350
Austin, TX 78731
Telephone: (512) 539-2626
Facsimile: (512) 539-2627

Attorneys for Plaintiff
DIGITAL REG OF TEXAS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DIGITAL REG OF TEXAS, LLC,

Plaintiff,

v.

ADOBE SYSTEMS INCORPORATED,
VALVE CORPORATION, ELECTRONIC
ARTS INC., UBISOFT, INC., SYMANTEC
CORPORATION, AVG TECHNOLOGIES
USA, INC., ZYNGA GAME NETWORKS
INC., ZYNGA, INC., and INTUIT INC.

Defendants.

Case No. 4:12-cv-01971-CW (KAW)

STIPULATION AND ~~PROPOSED~~
ORDER OF DISMISSAL AS TO
DEFENDANT AVG TECHNOLOGIES
USA, IMC

IT IS HEREBY STIPULTATED AND AGREED, by and between plaintiff Digital Reg of Texas, LLC, ("Plaintiff") and defendant AVG Technologies USA, Inc. ("Defendant"), pursuant to Fed. R. Civ. P. 41(a)(2) and subject to the approval of the Court, that Plaintiff's claims in this action be, and upon approval are, dismissed WITH PREJUDICE and Defendant's counterclaims in this action be, and upon approval are, dismissed WITHOUT PREJUDICE, subject to the terms of that certain agreement entitled "SETTLEMENT AND LICENSE AGREEMENT" dated March 20, 2013, with each party to bear its own cost, expenses, and attorney's fees.

Dated: April 1, 2013

BARTKO ZANKEL TARRANT & MILLER

By: /s/ W. Paul Schuck
W. Paul Schuck

DiNOVO PRICE ELLWANGER & HARDY LLP
Andrew G. DiNovo (admitted *Pro Hac Vice*)
Adam G. Price (admitted *Pro Hac Vice*)

Attorneys for Plaintiff
DIGITAL REG OF TEXAS, LLC

Dated: April 1, 2013

GOODWIN PROCTER LLP

By: /s/ William A. Meunier
William A. Meunier (admitted *Pro Hac Vice*)

Attorneys for Defendant
AVG TECHNOLOGIES USA, INC.

ATTESTATION OF E-FILER

In compliance with Local Rule 5-1(i), the undersigned ECF user whose identification and password are being used to file this document, hereby attests that all signatories have concurred in the filing of this document.

Dated: April 1, 2013

/s/ W. Paul Schuck
W. Paul Schuck


PROPOSED ORDER OF DISMISSAL

CAME ON THIS DAY for consideration the Stipulation of dismissal with prejudice of all claims asserted by plaintiff Digital Reg of Texas, LLC, against defendant AVG Technologies USA, Inc., and dismissal without prejudice of all counterclaims asserted by defendant AVG Technologies USA, Inc. against plaintiff Digital Reg of Texas, LLC, in this case and the Court being of the opinion that said Stipulation should be ENTERED, it is hereby

ORDERED, ADJUDGED AND DECREED that all of plaintiff's claims asserted against defendant in this suit are hereby dismissed with prejudice and all of defendant's counterclaims asserted in this suit are hereby dismissed without prejudice, subject to the terms of an agreement entitled "SETTLEMENT AND LICENSE AGREEMENT" and dated March 20, 2013.

It is further ORDERED that all attorneys' fees and costs are to be borne by the party that incurred them.

DATED: 4/1/2013


The Honorable Claudia Wilken
United States District Court Judge